M/057/0006

State of Utah
GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

RECEIVED E-Mail
SEP 14 2016
Div. of Oil, Gas & Mining

September 7, 2016

DAQC-1258-16
Site ID 11840 (B)

Sent Via Certified Mail No. 70150640000473657148

Tysen Butters
C. E. Butters Realty & Construction
760 North Harrisville Road
Harrisville, UT 84404

Dear Mr. Butters

Re: Warning Letter – Towers Sand and Gravel, Utah Administrative Code (UAC) R307-401, Weber County

On August 4, 2016, the Utah Division of Air Quality (DAQ) conducted an inspection of Towers Sand and Gravel located at 1476 West 4300 North, Pleasant View, Utah. The DAQ believes that C.E. Butters Realty & Construction was in violation of UAC R307-401-5 for failure to:

(1) Except as provided in R307-401-9 through R307-401-17, any person subject to R307-401 shall submit a notice of intent to the director and receive an approval order ***prior*** to initiation of construction, modification or relocation.

Please be aware this letter is a warning and that future instances of noncompliance may be considered violations of the above listed rules and C. E. Butters Realty & Construction may be assessed penalties up to $10,000 per day if found to be in violation of Utah Air Quality Rules.

A response to this letter is not required. If you have any questions regarding this letter, please contact Jay Morris at (801) 536-4079 or at jpmorris@utah.gov.

Sincerely,

Document Date 9/7/2016
DAQ-2016-010733

Bryce C. Bird
Director

BCB:JSJ:bp

cc: Royal DeLegge, Salt Lake County Health Department

195 North 1950 West • Salt Lake City, UT
Mailing Address: P.O. Box 144820 • Salt Lake City, UT 84114-4820
Telephone (801) 536-4000 • Fax (801)536-4099 • T.D.D. (801) 903-3978
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IMPORTANT: Save this receipt for your records.

PS Form **3800,** April 2015 *(Reverse)* PSN 7530-02-000-9047

DAQC-1176-16
Site ID 14337 (B1)

MEMORANDUM

TO: **FILE – INSITUFORM TECHNOLOGIES, LLC**

THROUGH: Jay Morris, Minor Source Compliance Section Manager

FROM: Sarah Malluche, Environmental Scientist

DATE: August 15, 2016

SUBJECT: Full Compliance Evaluation, Minor, Iron County

INSPECTION DATE: August 10, 2016

SOURCE LOCATION: 2255 West 850 North, Cedar City, Utah. I-15 south take exit 59, go west on UT-56. Turn right onto Airport Road, then left onto 850 North. The company is located in a warehouse on the south side of 850 North.

SOURCE CONTACT: James Lawson, Plant Manager: 435 867 3835
rstewart@insituform.com

OPERATING STATUS: Operating

PROCESS DESCRIPTION: Pipe liners are brought in from another plant. Resin is mixed and then pumped into the liners which are then shipped to the job site. At the job site, the liners are inflated and dried in place to rehabilitate old underground pipes.

APPLICABLE REGULATIONS: Approval Order dated 8/19/16 (DAQE-AN143370002-16 and DAQE-IN143370002-16 dated 7/7/16), 40 CFR Part 60 Subpart IIII, 40 CFR Part 63 Subpart ZZZZ

SOURCE EVALUATION:

Section I: GENERAL PROVISIONS

I.1 Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]

I.2 All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years.

I.3 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are

being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded

I.4 The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns

I.5 The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]

I.6 All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]

I.7 The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]

Status: In compliance. No modifications or breakdowns have occurred. All records and limits are within the required AO limits. Emission inventory have not yet been requested from this site.

Section II: SPECIAL PROVISIONS

II.A The approved installations shall consist of the following equipment:

II.A.1 **Wetout Facility**
Source-wide

II.A.2 **Cure In Place Process (CIPP)**
The two (2) wetout lines consist of the following NJR Industries manufactured equipment:

1. CIPP Mixer #1

2. CIPP Conveyor #1

3. CIPP Conveyor #2

II.A.3 **Integral Lining System (ILS)**
The ILS process consists of the following NJR Industries manufactured equipment:

1. ILS Mixer #2

2. ILS Conveyor #3

II.A.4 **Resin Storage Tanks**
Four (4) 5,880-gallon (each) resin storage tanks, each with horizontal fixed roofs

II.A.5 **Scrap Resin Building**
55-gallon resin storage drum

II.A.6 **Emergency Generator**
Maximum Capacity: 32-kW/43 hp
Fuel Type: Diesel

II.A.7 **Diesel Storage Tank**
Maximum Capacity: 200 gallons

Status: In compliance. The above listed equipment is present onsite. The emergency generator and diesel storage tanks were installed in 2004 and included in this updated AO. No other equipment was observed at this site.

II.B Requirements and Limitations

II.B.1 Wetout Facility

II.B.1.a Unless otherwise specified in this AO, the owner/operator shall not allow visible emissions from any source on site to exceed 20 percent opacity.

The opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-401-8]

Status: In compliance. No visible emissions were observed from any source on site during the inspection.

II.B.1.b The owner/operator shall not use any resin containing more than 45 percent by weight of Styrene. Records of consumption shall be determined by examination of resin supplier billing records and associated Material Safety Data Sheets (MSDS) certifying from the manufacturer of the HAP content. Records of consumption shall be kept for all periods when the facility is in operation. [R307-401-8]

Status: In compliance. I reviewed MSDS and the resin does not contain more than 45% by weight of styrene. Records of consumption have been maintained. Refer to attachments.

II.B.1.c The facility wide emission of HAPs from the associated wetout facility operations shall not exceed the following totals:

9.92 tons per rolling 12-month period for Styrene

Compliance with these limitations shall be determined on a rolling 12-month total. By the first day of each month a new 12-month total shall be calculated using data from the previous 12 months. Monthly calculations shall be made no later than 20 days after the end of each calendar month. Records of consumption and associated MSDS certified by the manufacturer of HAP content shall be kept for all periods when the plant is in operation. [R307-401-8]

II.B.1.d Styrene emissions shall be determined by maintaining a record of Styrene emitting materials used each month. The record shall include the following data for each Styrene containing materials used:

1. Name of each Styrene emitting material, such as: resin, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.

2. Quantity of each material used in gallons and tons

3. Process and equipment the resin is being consumed in, such as CIPP Mixer 1, etc.

4. The amount of Styrene emitted monthly by each material used (tons/month)

   Resin Styrene emissions from the CIPP and ILS processes shall be determined by applying the following emission factors (EF) to the relevant processes:

   CIPP Mixer 1 and Mixer 2: 0.664 lbs. Styrene per ton resin
   CIPP Conveyor 1 and Conveyor 2: 0.611 lbs. Styrene per ton resin
   ILS Mixer 3: 0.201 lbs. Styrene per ton resin
   ILS Conveyor 3: 0.692 lbs. Styrene per ton resin
   Scrap Resin Curing Area: 0.09 lbs. Styrene per gallon resin

   The equations used to determine emissions of Styrene from the CIPP and ILS process shall be as follows:

   Emissions (tons/month) =
   Styrene EF (lb/ton) x Resin Consumption (ton/month) x 1 ton/2000 lbs.

The equation used to determine emissions of Styrene from the Scrap Resin Curing Area shall be as follows:

Emissions (ton/month) =
Styrene EF (lbs. /gal) x Resin Consumption (gal/month) x 1 ton/2000 lbs.

5. The amount of Styrene emitted monthly from all materials used (tons/month).

Status: In compliance. The 12-month rolling total of styrene is 2.43 tons/year. The source has maintained the styrene records since 2014. Refer to attachments.

II.B.1.e The diesel emergency generator shall not exceed 100 hours of maintenance and testing operation per rolling 12-month period.

To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Hours of operation shall be determined by supervisor monitoring and maintaining of an operations log. [40 CFR 60 Subpart III]

II.B.1.f The low sulfur diesel fuel (defined as containing less than 0.05% sulfur by weight) shall be burned in the emergency diesel engines on site.

The sulfur content shall be determined by ASTM Method D2880-71, D4294-89, or approved equivalent. Certification of diesel fuel shall be either by the owner/operator's own testing or by test reports from the diesel fuel marketer. [R307-401-8]

Status: In compliance. Ultra-low sulfur diesel is used as a fuel for the generator. The hours of operation for the diesel generator have been recorded at approximately 3 hours annually. Refer to attachments.

Section III: APPLICABLE FEDERAL REQUIREMENTS

In addition to the requirements of this AO, all applicable provisions of the following federal programs have been found to apply to this installation. This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including UAC R307.

NSPS (Part 60), A: General Provisions

Status: In compliance. Required reports, notifications, records and maintenance have been met.

NSPS (Part 60), IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Status: Not applicable. The engine was installed in 2004 therefore only 40 CFR Part 63 Subpart ZZZZ applies.

MACT (Part 63), A: General Provisions

Status: In compliance. Required reports, notifications, records and maintenance have been met.

MACT (Part 63), ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Status: In compliance. The 32 kW diesel (II.A.6) emergency generator was installed in 2004. The diesel engine is categorized as an existing (prior to June 12, 2006) area source. A non-resettable hour meter is required (66.6625(f)). 100 hour limit of calendar operation (66.6640(f)(1-4). Table 2d requires changing the oil and filter every 500 hours of operation or annually (whichever is first), inspect air cleaner every 1000 hours of operation or annually (whichever is first) inspect hoses and belts every 500 hours or annually (whichever is first). The operation log has been attached to this memo.

AREA SOURCE REGULATIONS:

R307-203. Emission Standards: Sulfur Content of Fuels

Status: In compliance. Ultra-low sulfur fuel is utilized at this source.

R307-214. National Emission Standards for Hazardous Air Pollutants

Status: In compliance. This condition is incorporated in the AO conditions and discussed in detail in the Federal Regulation section of this memo.

EMISSION INVENTORY: Pollutants in tons/year from engineer review:

Pollutant	tons/year
PM_{10}	0.003
$PM_{2.5}$	0.003
SO_X	0.004
NO_X	0.03
VOC	9.96
CO	0.02
CO_2e	2.3
combined HAPs	9.97

PREVIOUS ENFORCEMENT ACTIONS: CAN issued on 4/1/15 (DAQC-356-15) for unapproved equipment (emergency generator). An ESA was issued on 11/18/15 (DAQC-1400-15) for $359.00 and resolved on 1/6/16.

COMPLIANCE STATUS & RECOMMENDATIONS: In compliance. The source is complying with the current AO and all the current federal regulations. I recommend no further action.

RECOMMENDATION FOR NEXT INSPECTION: None.

ATTACHMENTS: Consumption records of styrene, generator hour log

Insituform Technologies, LLC
Cedar City, UT
Permit Requirements II.B.1.c, II.B.1.d.5., & II.B.1.e.6

TPY Limit (9.92 TPY VOC & HAP) 12 Month Rolling Total						
Styrene Emissions (Both HAP/VOC)		Monthly Emissions (CIPP) (Tons)	Monthly Emissions (ILS) (Tons)	Monthly Scrap Emissions (CIPP & ILS) (Tons)	**Monthly Styrene Emissions (Tons/Month)**	**12 Month Rolling Emissions * (TPY)**
2014	January	0.1790	0.0077	0.0990	**0.29**	**3.20**
	February	0.2662	0.0241	0.2115	**0.50**	**3.42**
	March	0.2639	0.0334	0.1035	**0.40**	**3.61**
	April	0.1659	0.0160	0.0990	**0.28**	**3.74**
	May	0.1377	0.0213	0.0900	**0.25**	**3.79**
	June	0.1161	0.0339	0.1035	**0.25**	**3.91**
	July	0.1286	0.0391	0.0900	**0.26**	**3.94**
	August	0.1569	0.0170	0.0900	**0.26**	**3.98**
	September	0.1031	0.0214	0.0855	**0.21**	**3.85**
	October	0.1314	0.0511	0.0945	**0.28**	**3.82**
	November	0.1638	0.0012	0.0855	**0.25**	**3.77**
	December	0.1125	0.0224	0.0720	**0.21**	**3.44**
2015	January	0.2443	0.0204	0.0900	**0.35**	**3.51**
	February	0.1816	0.0201	0.0855	**0.29**	**3.29**
	March	0.1525	0.0166	0.0855	**0.25**	**3.15**
	April	0.1041	0.0150	0.0900	**0.21**	**3.07**
	May	0.1206	0.0211	0.0945	**0.24**	**3.06**
	June	0.1312	0.0236	0.0855	**0.24**	**3.05**
	July	0.0901	0.0425	0.0900	**0.22**	**3.01**
	August	0.1351	0.0039	0.0990	**0.24**	**2.99**
	September	0.0823	0.0171	0.0855	**0.18**	**2.96**
	October	0.0788	0.0217	0.0900	**0.19**	**2.88**
	November	0.0951	0.0131	0.0810	**0.19**	**2.81**
	December	0.1182	0.0000	0.0630	**0.18**	**2.79**
2016	January	0.1724	0.0146	0.0900	**0.28**	**2.71**
	February	0.1248	0.0137	0.0810	**0.22**	**2.64**
	March	0.0679	0.0529	0.0900	**0.21**	**2.60**
	April	0.0687	0.0255	0.0855	**0.18**	**2.57**
	May	0.0865	0.0160	0.0726	**0.18**	**2.51**
	June	0.0547	0.0394	0.0810	**0.18**	**2.44**
	July	0.0982	0.0270	0.0855	**0.21**	**2.43**
	August	0.0524	0.0000	0.0225	**0.07**	**2.27**
	September	0.0000	0.0000	0.0000	**0.00**	**2.08**
	October	0.0000	0.0000	0.0000	**0.00**	**1.89**
	November	0.0000	0.0000	0.0000	**0.00**	**1.70**
	December	0.0000	0.0000	0.0000	**0.00**	**1.52**

*The value shown for each month corresponds to the rolling average for the 11 prior months

Diesel Emergency Generator Tracking per II.B.1.e.

Testing and maintenance hours must not exceed 100 hours.

Year	Month	Hours Run for Testing	Hours Run for Maintenance	Total Testing & Maintenance Hours
2014	August	0.67	0	0.7
2014	September	0.67	0	0.7
2014	October	0.83	0	0.8
2014	November	0.67	0	0.7
2014	December	0.83	0	0.8
2015	January	0.67	0	0.7
2015	February	0.67	0	0.7
2015	March	0.67	0	0.7
2015	April	0.83	0	0.8
2015	May	0.67	0	0.7
2015	June	0.67	0	0.7
2015	July	0.83	0	0.8
2015	August	0.67	0	0.7
2015	September	0.83	0	0.8
2015	October	0.67	0	0.7
2015	November	0.67	0	0.7
2015	December	0.83	0	0.8
2016	January	0.67	0	0.7
2016	February	0.67	0	0.7
2016	March	0.83	0	0.8
2016	April	0.67	0	0.7
2016	May	0.67	0	0.7
2016	June	0.83	0	0.8
2016	July	0.66	0.50	1.2
2016	August			0.0